



Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out TradingHub Group Limited's ("TH") actions to understand all potential modern slavery and human trafficking risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chains. This statement relates to actions and activities during the financial year ending 31st December 2023 ("FY23").

TH recognises that it has a responsibility to take a robust approach to slavery and exploitative behaviours and is absolutely committed to preventing this in our business activities and supply chains. We are committed to improving our practices to combat modern slavery and human trafficking in our business by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking.

What is modern slavery and human trafficking?

Modern slavery and human trafficking are international crimes, affecting millions of people around the world. Sadly, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

Organisational structure and supply chains

TH is a private company limited by shares, incorporated in England and Wales. We are a finance-focused big data firm - our goal is to create the world's leading financial markets analytics platform to help our customers unleash their organisational potential.

Although we are not required to make a modern slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our business and in our supply chains.

Our headquarters are based in London and we also have subsidiary companies based in Canada, the US and Singapore.

Our business largely uses people employed directly by TH or its subsidiaries. Our external suppliers are mostly UK and North American based companies in low-risk sectors such as financial and professional services. We believe that the risk of modern slavery and human trafficking in our supply chain is low, but we remain vigilant and continue to review our processes, in respect of new and existing suppliers, and our internal policies.

Policies

We have a zero-tolerance approach to modern slavery and human trafficking and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or that of those who supply us. Our specific policies and procedures that ensure we conduct business in a fair, honest and lawful way include:

- Business ethics policies outlining the minimum standards of ethical behaviour required, for example:

- Anti-Slavery and Human Trafficking Policy;
- Anti-Bribery and Corruption Policy;
- Anti-Money Laundering Policy;
- Gifts and Hospitality Policy; and
- Anti-Facilitation of Tax Evasion Policy.

These policies do not provide an exhaustive list of every law that might apply or action that an employee needs to take for every situation, but instead provides a framework and guidance for employees to operate in an open, honest, ethical and principled way.

- Employment policies that protect our employees from unfair treatment and promote a fair and inclusive workplace.
- Robust recruitment processes in line with relevant employment laws.
- Competitive pay and rewards that are reviewed annually.
- A Vendor Management Policy which sets out how we deal with suppliers and the due diligence that is undertaken.
- A Supplier Code of Conduct which sets out our expectations of suppliers.
- A Whistleblowing Policy which seeks to encourage employees to report any concerns related to the direct activities, or the supply chains of, TH.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our policies and procedures are continuously kept under review and updated.

Due diligence

As a first step in any procurement process, employees are required to undertake due diligence on any new supplier, including a reputation check. When identifying high risk areas in our supply chain relationships we consider:

- Financial risk;
- Business, operational and transactional risk;
- Regulatory risk; and
- Environmental, social and governance compatibility.

Our environmental, social and governance questionnaire, which forms part of our Vendor Management Policy, includes specific questions for suppliers on modern slavery and human trafficking. Any risks identified in the due diligence process (including any potential modern slavery or human trafficking risks) are assessed by key stakeholders before final sign off is given. We aim to ensure that our supplier due diligence procedures are appropriate to our modern slavery and human trafficking risk.

We have a Procurement Specialist who has oversight of supplier management. Where possible we build close, stable and long-standing relationships with our suppliers. Our expectations of suppliers, including in the areas of labour and human rights, are set out in our Supplier Code of Conduct.

If agency workers are employed, this would only be through reputable employment agencies that adhere to our anti-slavery and human trafficking policy (or equivalent policies).

Monitoring

As set out in this statement, TH has in place internal procedures to ensure the business is clear on its obligations to combat modern slavery and human trafficking. We also have an internal legal, compliance and procurement team to assist in this area.

Training

A mandatory modern slavery online training module was launched at the end of FY23 for all employees.

Employees are encouraged to report any concerns or suspicions regarding the presence of modern slavery or human trafficking within the supply chain. Our policies (including the whistleblowing policy) are available to all employees on the internal HR platform.

Should any employee need further information or support with regards to modern slavery or human trafficking this will be provided.

Performance indicators

Our focus for the next financial year will be to:

- continue to strengthen and enhance our approach to identifying and managing modern slavery and human trafficking risk across our business operations;
- continue to provide training to our employees on their obligations to tackle and identify modern slavery and human trafficking risks; and
- use key performance indicators (KPIs) such as:
 - the percentage of suppliers and sub-contractors vetted for ethical labour practices;
 - the number of reported breaches in the past year; and
 - percentage of TH staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains, to measure how effective we are at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

Approval

This voluntary modern slavery and human trafficking statement is made in connection with section 54 of the Modern Slavery Act 2015, for FY23. It was formally approved by TH's Board of Directors on 8 January 2024.

Elaine Thomas

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Director, TradingHub Group Limited